

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

LORD ABBETT INVESTMENT TRUST –  
LORD ABBETT SHORT DURATION  
INCOME FUND, et al.,

Plaintiffs,

v.

VALEANT PHARMACEUTICALS  
INTERNATIONAL, INC., et al.,

Defendants.

Civil Action No. 17-CV-6365 (MAS)(LHG)

NOTICE OF MOTION TO DISMISS  
COUNTS I-III, V, AND VII-VIII OF  
PLAINTIFFS' COMPLAINT

(ORAL ARGUMENT REQUESTED)

Motion Date: April 2, 2018

PLEASE TAKE NOTICE that on April 2, 2018, defendant J. Michael Pearson ("Pearson") will and hereby does move pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure before the Honorable Michael A. Shipp, United States District Judge for the District of New Jersey, at the Clarkson S. Fisher Building and U.S. Courthouse, 402 East State Street, Trenton, New Jersey 08608, for an order dismissing Counts I-III (New Jersey statutory racketeering claims), Count V (Section 18 claim), and Counts VII-VIII (common law fraud/fraudulent inducement and negligent misrepresentation claims) in Plaintiffs' Complaint. Pursuant to Local Civil Rules 7.1(b)(4) and 78.1(b), Pearson respectfully requests that the Court grant oral argument on this motion.

In support of this motion, Pearson relies upon the memorandum of law submitted by Valeant in support of its motion to dismiss the same counts of Plaintiffs' Complaint and all further filings and proceedings had in these actions. For this reason, Pearson need not submit his own memorandum of law in support of this motion.

Dated: December 6, 2017      DEBEVOISE & PLIMPTON LLP

By:                                      s/ Holly S. Wintermute

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